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8 **ATTORNEYS FOR DEFENDANT**
9 **ALASKA AIRLINES, INC.**

10
11 **UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
13

14 WILLIAM LERETTE, an individual,

15 Plaintiff,

16 vs.

17 ALASKA AIRLINES, INC., and DOES
18 1 through 20, Inclusive,

19 Defendants.

Case No. **2:17-cv-03782-DSF-AJW**

WITNESS LIST OF DEFENDANT
ALASKA AIRLINES, INC.
[L.R. 16-5]

PTC: April 2, 2018
TRIAL: May 1, 2018
JUDGE: Dale S. Fischer
Courtroom: 7D

Action Filed: 11/21/2016

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23 In accordance with Local Rule 16-5, and with the Court's Order Re Jury
24 Trial Dates, Defendant Alaska Airlines, Inc. hereby sets forth the following list of
25 witnesses it intends to call at trial in its case in chief along with a description of
26 each witness' testimony and a time estimate for both direct and cross examination.
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WITNESS LIST OF DEFENDANT ALASKA AIRLINES, INC.
WILLIAM LERETTE V. ALASKA AIRLINES, INC.
Case No. 2:17-cv-03782-DSF-AJW

1 **1. Lauren Journey:** Ms. Journey was the Alaska Airlines flight attendant who
2 was operating the food cart aboard the flight when it struck plaintiff's knee. Ms.
3 Journey will testify regarding Alaska's flight attendant training and cabin safety
4 procedures with respect to the operation of service carts, and that she followed her
5 training and those procedures during plaintiff's flight. She will also testify
6 regarding the cabin service that the flight attendants conducted on plaintiff's flight,
7 including that this incident occurred while she was conducting food service, that
8 she was moving the cart slowly up the aisle every two or three rows and then
9 stopping, that she was observing for passengers whose knees or elbows might have
10 been encroaching into the aisle, that she was warning passengers to keep their knees
11 and elbows out of the way, as well as the circumstances leading up to this incident
12 and her communication with and observations of plaintiff during the remainder of
13 the flight after the incident. Estimated time for direct exam: 45 minutes.

14 Estimated time for cross-exam: 30 minutes.

15 **2. Donald Roberson, Jr.:** Mr. Roberson is the Retail Sales and Service
16 Manager at Contractors Wardrobe where plaintiff was employed at the time of this
17 incident. He was also plaintiff's direct supervisor. Mr. Roberson will testify
18 regarding the nature and demands of plaintiff's job, the quality of plaintiff's job
19 performance before and after this incident, plaintiff's performance reviews, his
20 observations of plaintiff following this incident, his communications with plaintiff
21 following the incident aboard the Alaska Airlines flight and following the incident
22 in January 2017 in which plaintiff alleges he hurt his back, and the circumstances
23 surrounding plaintiff's resignation. Estimated time for direct exam: 45 minutes.

24 Estimated time for cross-exam: 30 minutes.

25 **3. *Rosalia Schmidt:** Ms. Schmidt was the Human Resources Manager at
26 Contractors Wardrobe when plaintiff was employed there following this incident.
27 She will testify regarding plaintiff's positions at the company as well as his
28

1 compensation. She will also testify regarding company safety policies. Estimated
2 time for direct exam: 30 minutes. Estimated time for cross-exam: 20 minutes.

3 **4. Robert Wilson, M.D.:** Dr. Wilson is a Board Certified orthopedic surgeon.
4 He has reviewed plaintiff's medical records and performed the IME on plaintiff.
5 He will offer expert opinion testimony regarding the tests and objective findings,
6 diagnoses and prognoses concerning plaintiff's alleged knee and back injuries.
7 Estimated time for direct exam: 45 minutes. Estimated time for cross-exam: 30
8 minutes.

9 **5. Edward L. Bennett, M.A., C.R.C., C.D.M.S.:** Mr. Bennett is a vocational
10 rehabilitation expert. He will offer expert opinion testimony regarding plaintiff's
11 earnings history, his functional work restrictions following his alleged knee injury
12 and following his alleged back injury, the opinions and methodology of plaintiff's
13 vocational rehabilitation and economics experts, and plaintiff's potential future
14 earnings. Estimated time for direct exam: 45 minutes. Estimated time for cross-
15 exam: 30 minutes.

16 **6. Paula Gaudet:** Ms. Gaudet was a line flight attendant for Southwest
17 Airlines for thirteen years, spent five years developing curriculum and conducting
18 flight attendant training, and spent fifteen years as Southwest's Director of Inflight
19 Regulatory and Safety. She will offer expert opinion testimony regarding the duties
20 and responsibilities of the flight attendants aboard plaintiff's aircraft in general and
21 as to food and beverage service specifically, the training received by flight
22 attendant Lauren Journey from Alaska Airlines, whether Ms. Journey was
23 conducting her food service aboard plaintiff's flight safely and in accordance with
24 Alaska's training and procedures, and whether and how the incident involving
25 plaintiff's knee could have been avoided. Estimated time for direct exam: 45
26 minutes. Estimated time for cross-exam: 30 minutes.

1 Please note that defendant Alaska Airlines, Inc. reserves its right to add
2 witnesses to this list and to call impeachment witnesses whose names might not
3 appear on this list.

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5 Dated: March 12, 2018

Respectfully submitted,
LEADER & BERKON LLP

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9 By: s/ *Arthur I. Willner*
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CERTIFICATE OF SERVICE

William Lerette v. Alaska Airlines, Inc., et al.
Case No.: **2:17-cv-03782-DSF-AJW**

I declare:

On March 12, 2018, I electronically filed the following document(s):

WITNESS LIST OF DEFENDANT ALASKA AIRLINES, INC. [L.R. 16-5]

I have caused the above-mentioned document(s) to be electronically served using CM/ECF system which will send notification of such filing to the following email addresses:

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☒ **BY ELECTRONIC MAIL:** I have caused the above-mentioned document(s) to be electronically served on the above-mentioned person(s), who are currently on the list to receive e-mail notices for this case.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on March 12, 2018, at Los Angeles, California.

S/ Sandra Alvarenga

Sandra Alvarenga